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June 17, 2022

By ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Adedayo John et al.*, 21 Cr. 609 (LAP)

Dear Judge Preska:

I write on behalf of defendant Oluwadamilola Akinpelu to respectfully request an order modifying Ms. Akinpelu's conditions of pretrial release. Specifically, because Ms. Akinpelu has consistently complied with those conditions for eight months and the location-monitoring condition interferes with her employment, Ms. Akinpelu asks for that condition to be removed.

Ms. Akinpelu was arrested on October 13, 2021, and released the same day on a \$100,000 bond. Her travel is restricted to the Southern and Eastern Districts of New York and the District of Connecticut. Relevant here, one condition of release is that Ms. Akinpelu is prohibited from being in the vicinity of an airport, a condition that is enforced by GPS monitoring.

The GPS monitoring device causes a hardship. Ms. Akinpelu makes a living doing hair and makeup.¹ She reports that she has lost numerous existing customers because they saw the ankle bracelet and found out about the case and did not feel comfortable coming to her home or having her come to theirs. Removal of the ankle bracelet will not bring those customers back, but it could help Ms. Akinpelu retain existing customers, especially with the arrival of summer, when Ms. Akinpelu will no longer be able to cover the device inconspicuously.

I have conferred with Pretrial Services Officer Francesca Piperato, who informs me that Pretrial does not object to the removal of location monitoring. I have also conferred with counsel for the government, who opposes lifting the location monitoring condition. Thank you for your attention to this matter.

Defendant Oluwadamilola Akinpelu's request to remove her GPS monitoring device is denied. Even assuming prospective customers find the bracelet to be unappetizing, there is no reason that Ms. Akinpelu cannot dress to obscure its presence. **SO ORDERED.**

Dated: June 21, 2022
New York, New York

¹ Ms. Akinpelu also works with Gopuff as a delivery person.


LORETTA A. PRESKA
Senior United States District Judge

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Respectfully submitted,



Ezra Spilke

cc: Oluwadamilola Akinpelu, by email
Francesca Piperato, Pretrial Services, by email
All counsel of record, by ECF